



Wall Street Plaza
88 Pine Street, 32nd Floor, New York, NY 10005
Tel: 212-867-4100 Fax: 212-867-4118
www.fkblaw.com

February 21, 2025

VIA ECF Filing

Hon. Taryn A. Merkl, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Fair Housing Justice Center, Inc. et al. v. Juda Niayzov et al.*
Civil Case No.: 1:24-cv-04201
FKB File No.: 302.175

Dear Judge Merkl:

Our firm represents Womcore LLC d/b/a Remax Edge and Xian Jin Zhang (collectively, "Remax") in the above-referenced matter. We on behalf of all defendants concerning the within proposed Initial Case Management Order Worksheet (the "CMO").

Defendants respectfully request permission from the Court to adopt a plan for discovery different from the guideline structure provided in the CMO. As noted in the proposed CMO, the parties anticipate ten depositions will be taken, as well as four experts produced. Given the extensive discovery anticipated, and the need to schedule the ten depositions among six different parties, the parties therefore jointly seek an extension of time to complete the deadline goals.

In the proposed CMO, the parties have extended the proposed final certification by about six weeks in order to accommodate the above. Plaintiff does not consent to this request. We thank the Court for its consideration of these requests.

Respectfully submitted,

FURMAN KORNFELD & BRENNAN LLP

Spencer A. Richards
Asher Kest

cc: All Counsel of Record – *via ECF*

Fair Housing Justice Center, Inc. et al v. Niayzov et al

Civil Case No.: 1:24-cv-04201

Page 2
